

JASON M. FRIERSON
United States Attorney
Nevada Bar No. 7709
JACOB H. OPERSKALSKI
Assistant United States Attorney
Nevada Bar No. 14746
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Jacob.Operaskalski@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROSALIO ANDRES SIGUENZA-
ROMERO, aka "Tweety,"

Defendant,

ZENITH FIREARMS, INC.,

Petitioner.

2:20-CR-156-RFB-DJA

**Third Stipulation Regarding ECF Docs.
404-406**

The United States of America and counsel for Zenith Firearms, Inc. (ZFI), Aaron D. Lovaas, Esq., agree as follows:

1. On June 2, 2023, Zenith Firearms, Inc. (ZFI) filed a Petition for Ancillary Hearing, ECF No. 404, Declaration of Kutlay Kaya, ECF No. 405, and Certificate of Service, ECF No. 406.

2. The United States has not filed a response, but is in contact with counsel for the Petitioner with the intent of negotiating a resolution without the need for the hearing.

3. Counsel for the Petitioner does not object to the United States filing a response at a later date, but counsel for the Petitioner and for the United States stipulate that the Petition shall be held in abeyance while the Petitioner and the United States negotiate in good faith.

4. On October 17, 2023, the Court ordered "Counsel to file resolution or Status Report within 60 days." ECF No. 548 at 2.

5. On December 18, 2023, the Court ordered: "Stipulated Resolution, Status Report or Government Response is due on or before 3/18/2024." ECF No. 584.

6. At this time, the United States is awaiting additional documentation from the Petitioner to support the claim.

7. This stipulation is not sought for purposes of delay.

8. The parties are requesting another 60 days to resolve this.

9. If the negotiations do not result in a stipulated resolution, the United States and counsel for the Petitioner will inform the Court, and the United States will then file a response to the Petition.

Respectfully submitted this 18th day of March, 2024.

NEWMYER & DILLION LLP

Aaron D. Lovaas
AARON D. LOVAAS, ESQ
Counsel for Zenith Firearms, Inc. on behalf of
ZENITH FIREARMS, INC.
Petitioner

JASON M. FRIERSON
United States Attorney

Jacob H. Operskalski
JACOB H. OPERSKALSKI
Assistant United States Attorney

IT IS SO ORDERED.


RICHARD T. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: 3/18/2024